



Human Rights Policy



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Commitment

Nitro Software PTY Ltd. and its affiliates and subsidiaries (“Nitro” or the “Company”) has established this Human Rights Policy (the “Policy”) to demonstrate our commitment to the protection and preservation of human rights globally and in the work environment. The Policy applies to employees, contractors, and representatives of the Company at any location in which Company business is being conducted.

Approach

Nitro’s commitment to human rights is embedded in our culture and values; as reflected in the Code of Conduct, Company policies, and actions toward employees, contractors, representatives, business partners, suppliers, and the communities and countries in which we live and work. The Policy is informed by the fundamental principles of human rights, as enumerated by recognized public conventions, including but not limited to the **United Nations Guiding Principles on Business and Human Rights**, the **United Nations Universal Declaration of Human Rights**, the **Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises**, and the **International Labor Organization’s Conventions**.

Principles

Nitro respects the principles of the United Nations Universal Declaration of Human Rights and seeks to advance the following principles in particular as these are material to the Company’s operations:

- **Forced labor, Child labor, and Human Trafficking:** Nitro strictly prohibits the use of forced labor, child labor, human trafficking, and all forms of modern slavery in its operations, and complies with all applicable laws and regulations against these activities. In consideration of the UK Modern Slavery Act and the Australian Modern Slavery Act, Nitro continuously improves its understanding of modern slavery risks to enhance its program. Employees, contractors, suppliers, or representatives who fail to meet Company standards regarding slavery and trafficking are subject to immediate cancellation or termination.
- **Personal Privacy:** We are dedicated to ensuring that the data entrusted to us by our employees and customers is secure, private, and managed responsibly
- **Diversity, Equity and Inclusion:** We are committed to fostering a culture of equal opportunity and to prohibit discrimination, harassment, and retaliation of any kind. We aim to promote



diversity of gender, race, sexual orientation, disability, and other factors during the hiring process, develop business practices that promote gender equity with consideration of the United Nations' Women's Empowerment Principles, and protect the rights of minority groups and women, including indigenous peoples in accordance with International Labor Organization Convention No. 169., among other protected classes.

- **Freedom of Association:** Nitro understands the importance of fair representation in employer-employee relationships and is committed to honoring its employees' entitlements to freedom of association, collective bargaining, and other applicable rights. As provided by law, employees are free to form or join groups which aim to communicate and protect their best interests. A culture of open communication regarding working conditions without fear of retaliation is fundamental to our collective success.
- **Workplace Health and Safety:** The safety, health, and wellness of Nitro employees and their family members is vitally important to us. We operate in accordance with applicable safety laws and procedures to ensure we provide a safe work environment for all.
- **Work Hours and Wages:** We comply with all applicable state, federal, and international labor, wage, and working hour laws and regulations. We compensate employees competitively relative to the industry and local labor market, honor all legal requirements regarding working hours, overtime pay, and time off, and are firmly committed to providing equal payment for equal work.

Reporting

In the event of a potential or actual human rights violation or concern, please contact the Compliance Team at Privacy@gonitro.com. The Compliance Team will assist with reported issues that require contact with governing authorities.

Administration

This Policy is administered and periodically reviewed by Nitro's Compliance Team. Nitro reserves the right to change this Policy at any time without notice.



Revision History

Revision Number	Implementation Date	Author(s)	Approval	Brief Description
V1.0	September 1, 2024	Amber Aerts	Orlagh Moore	V1 – Initial Version

Nitro Software is a global SaaS leader in PDF software, document management and electronic signatures. Nitro’s comprehensive document solution includes powerful PDF tools, highly secure eSigning with identity verification capabilities, and real-time analytics to measure ROI and quantify sustainability efforts—all supported by a best-in-class customer success and change management team. With more than 3 million licensed users and 13,000+ business customers across 157 countries, Nitro serves 67% of the Fortune 500. For more information, visit: GoNitro.com.



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